

MEMO ENDORSED:

The conference scheduled for September 8, 2022, is adjourned to **October 13, 2022, at 10:15 a.m.**

SO ORDERED.



Paul G. Gardephe
United States District Judge
Dated: September 1, 2022



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

MARTIN BOWE
Assistant Corporation Counsel
Office: (212) 356-0894
Cell: (646) 498-7178
Email: mbowe@law.nyc.gov

August 30, 2022

VIA ECF

Hon. Paul G. Gardephe
U.S. District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room #705
New York, NY 10007

Re: *R.G. v. New York City Dep't of Educ.*, 22-cv-2048 (PGG)(RWL)

Dear Judge Gardephe:

I am an Assistant Corporation Counsel in the office of the Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, supervising attorney for Defendant in the above-referenced action, wherein Plaintiff raises individual and systemic claims for, *inter alia*, attorneys' fees, costs, and expenses for legal services regarding an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et. seq.* ("IDEA") and 42 U.S.C. § 1983, as well as for this action.

I write to respectfully request a 30-day adjournment of the Initial Pre-trial Conference currently scheduled for September 8 to October 8, 2022, or to a date thereafter convenient for the Court. Plaintiff consents to this request. This is the second request to adjourn the Initial Pre-Trial Conference; the first request was granted on July 14, 2022 (ECF No. 12). Additionally, Defendant respectfully requests, also with Plaintiff's consent, a one-month extension of the current briefing schedule for Plaintiffs' motion seeking attorneys' fees and costs as follows:

- (i) Plaintiffs' motion due on or before October 16, 2022;
- (ii) Defendant's Opposition due on or before November 17, 2022;
- (iii) Plaintiffs' Reply due on or before November 30, 2022.

Thank you for considering these requests.

Respectfully submitted,

/s/

Martin Bowe, Esq.
Assistant Corporation Counsel

cc: Kevin Mendillo, Esq. (Attorney for Plaintiff via ECF)